



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:MPR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 5, 2018

By ECF

A. Eduardo Balarezo, Esq.
400 Seventh Street, N.W.
Suite 306
Washington, D.C. 20004

William B. Purpura, Esq.
8 East Mulberry Street
Baltimore, MD 21202

Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

Pursuant to 18 U.S.C. § 3500, the government is disclosing to you the enclosed material related to its anticipated law enforcement witnesses at trial. This production supplements the government's production of such material on July 5, 2018. See Dkt. No. 260. It includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. The government will disclose additional § 3500 material related to its law enforcement witnesses as it becomes available.

Please note that the government is not disclosing § 3500 material for anticipated law enforcement witnesses that could identify the government's cooperating witnesses. The government will disclose such material at the time it discloses § 3500 material for its cooperating witnesses. It estimates that this additional material will be a few hundred documents.

If you have specific questions about the government's production, please reach out to the prosecution team.

Very truly yours,

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

ARTHUR G. WYATT, CHIEF
Narcotic and Dangerous Drug Section
Criminal Division,
U.S. Department of Justice

OF COUNSEL:

BENJAMIN G. GREENBERG
UNITED STATES ATTORNEY
Southern District of Florida

cc: Clerk of the Court (BMC) (by ECF and Hand)